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August 4, 2006

BY OVERNIGHT DELIVERY AND E-FILE

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 06-31

Dear Ms. Cottrell:

Enclosed for filing, on behalf of Bay State Gas Company ("Bay State"), please find Bay State's responses to the following Information Requests:

DTE-BSG-1-8 USW-1-30 (Supplemental) UWUA-2-6 (Supplemental)

Please do not hesitate to telephone me with any questions whatsoever.

Very truly yours,

Patricia M. French

cc: Paul Osborne (DTE)
A. John Sullivan (DTE)
Alexander Cochis, Assistant Attorney General (4 copies)
Charles Harak, Esq. (UWUA)
Nicole Horberg Decter, Esq. (USW)
Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
FIRST SET OF INFORMATION REQUESTS FROM THE DTE
D.T.E. 06-31

Date: August 4, 2006

Responsible: Stephen H. Bryant, President

DTE-BSG-1-8 Refer to Exh. BSG-1, at 21. Please provide all studies, analyses, etc. supporting the Company's contention that it has performed better than the industry average in terms of customer satisfaction.

RESPONSE: Mr. Bryant has reviewed the statement in light of the most recent information he has available, and now concludes this may no longer be the case. This statement was made in reference to the J.D. Powers Gas Utility Residential Customer Satisfaction Study for Bay State Gas Company from 2003, which will not be updated until September 2006. Mr. Bryant's most recent review of publicly available customer satisfaction data indicates that Bay State's performance, while still good, is not necessarily better than the Northeast natural gas distribution company average.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
FIRST SET OF INFORMATION REQUESTS FROM THE USW
D.T.E. 06-31

Date: August 4, 2006

Responsible: Stephen H. Bryant, President

USW 1-30: From June 1, 2005 to date, provide the total number of hours and the cost of overtime performed at the Springfield Call Center, aggregated by month. For the same time period, provide all documents consulted, informing, relating to or regarding the use of overtime to fill positions at the Springfield Call Center.

RESPONSE: Bay State is still researching this request and will supplement this response when the information has been compiled.

**SUPPLEMENTAL
RESPONSE:**

See Table USW-1-30 for the requested information.

TABLE USW-1-30

**Bay State Gas Company
Hours & Cost of Overtime at
Springfield Contact Center
June 2005 – May 2006**

		OT HOURS	
MONTH	YEAR	WORKED	PAY
Jun	2005	499	\$10,900
Jul	2005	293	\$18,100
Aug	2005	179	\$5,800
Sep	2005	76	\$6,800
Oct	2005	585	\$19,900
Nov	2005	617	\$21,600
Dec	2005	383	\$23,300
Jan	2006	306	\$19,100
Feb	2006	533	\$12,700
Mar	2006	384	\$26,400
Apr	2006	262	\$15,100
May	2006	613	\$17,900

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
SECOND SET OF INFORMATION REQUESTS FROM UWUA LOCAL 273
D.T.E. 06-31

Date: August 4, 2006

Responsible: Stephen H. Bryant, President

SUUPLEMENTAL RESPONSE

UWUA 2-6: Please list the name and title of each person at NiSource who plays any role in the setting of staffing levels at Bay State (including any increases or decreases to those staffing levels), including a description of the precise role each individual plays. To the extent that different individuals at NiSource have played a role in setting staffing levels over time, list the names and titles and relevant dates for each such person from January 1, 2003 to date.

RESPONSE: Please see Attachment UWUA 2-6 for the requested information. See also the Company's response to UWUA 1-7, which describes Bay State's capital and operating budgeting processes, and USW 1-13, which describes Mr. Bryant and Mr. Cote's reporting chain of command and responsibilities.

It is the responsibility of Bay State's leadership to determine the levels of service necessary to meet Bay State's business needs. For example, if meter-reading performance were to drop below required SQL levels, Mr. Bryant would require the Meter to Cash leadership to take whatever action necessary (including adding staff) to rectify the situation.

In the areas under direct Bay State leadership, such as operations or regulatory affairs, it is the responsibility of the leaders of those activities (Mr. Cote and Mr. Bryant, respectively) to identify the resources necessary to achieve the required levels of service for the various business activities, and to staff them accordingly. This staffing could include a mix of permanent employees, temporary employees, contractors, or consultants, that best fits the Company's needs.

NiSource support services do not have authority to order changes in staffing levels to those areas under direct Bay State management. Any discussions on staffing level changes in the Bay State led activities would take place between senior NiSource Corporate Leadership and the business segment leaders (Mr. Bryant and Mr. Cote), and on the basis of those discussions appropriate resource levels would be identified. Should that leadership hierarchy determine that staffing level changes are necessary (either increases or decreases), then the HR support group would assist in the resultant staffing process.

NiSource Corporate Leadership determines the overall compensation and benefits strategy for the corporation and on the basis of that strategy, Human Resources implements the specific programs for those employees not covered by a Collective Bargaining Agreement. For employees covered by Collective Bargaining Agreements, the business segment leadership, Human Resources and the leadership groups of the various unions negotiate the specific compensation and benefits for each group.

SUPPLEMENTAL RESPONSE

Please see Attachment UWUA 2-6 SUPP, which now includes the requested relevant dates.

NiSource / Bay State Organization 2005-2006			
SENIOR EXECUTIVE		EXECUTIVE	LEADERS
Robert C. Skaggs, Jr. (President & CEO, NiSource) Eff. 7/1/05	Kathleen O'Leary (Senior VP Energy Distribution & Regulated Revenue) Eff. 4/1/05	Stephen H. Bryant (President) Eff. 10/3/03	
	William H. Marple (Senior VP Distribution Operations) Eff. 4/1/05	Danny G. Cote (General Manager Distribution Operations East) Eff. 3/1/06	Dana C. Argo, Sr. (Manager Systems Operations) Eff. 6/1/04 Pamela A. Bellino (Manager Operations Center) Eff. 12/1/04 Francis W. St Cyr (Manager Operations Center) Eff. 5/1/02 Michael L. Laghetto (Manager Operations Center) Eff. 5/1/02
		Shawn L. Patterson (VP Engineering) Eff. 3/1/06 Peggy Landini (VP Support Operations) Eff. 3/1/06	Keith R. Dalton (Manager Engineering & Construction) Eff. Marie Walker (Manager Operations Service) Eff. 7/29/04
	Violet Sistovaris (Senior VP NI Administration Services) Eff. 4/1/05	Michael J. Davidson (Director Customer Contact Centers) Eff. 7/1/05 Charles Edward Shafer II (VP Meter to Cash) Eff. 10/3/03	Patricia M. Teague (Manager Customer Contact Center) Eff. 10/25/99 Lisa Ann Carmean (Manager Meter Reading & Collections) Eff. 5/1/02 Peter M. Klipa (Director Revenue Recovery) Eff. 9/1/03 Vicki L. Smith (Manager Bill Exception Management) Eff. 7/1/02

NiSource / Bay State Organization 2003-2004			
SENIOR EXECUTIVE		EXECUTIVE	LEADERS
Gary Neale, Chairman (President & Chief Executive Officer) Eff. 3/1/93	Robert C. Skaggs, Jr. Executive Vice President) Eff. 1/1/04	Stephen H. Bryant (President)	
	Samuel Miller (Executive Vice President) Eff. 9/1/02	Danny G. Cote (General Manager) Eff. 1/1/03	Dana C. Argo, Sr. (Manager Systems Operations) Pamela A. Bellino (Manager Operations Center) Francis W. St Cyr (Manager Operations Center) Michael L. Laghetto (Manager Operations Center) Keith R. Dalton (Manager Engineering & Construction) Marie Walker (Manager Operations Service)
		Charles Edward Shafer II (VP Meter to Cash) Eff. 10/3/03	Lisa Ann Carmean (Manager Meter Reading & Collections) Peter M. Klipa (Director Revenue Recovery)
		Violet Sistovar (VP Customer Contact Centers) Eff. 10/3/03	Vicki L. Smith (Manager Bill Exception Management) Patricia M. Teague (Manager Customer Contact Center)